

Kerry S. Culpepper (admitted *pro hac vice*)

Joshua J. Lee (admitted *pro hac vice*)

CULPEPPER IP, LLC

75-170 Hualalai Rd., STE B204

Kailua-Kona, HI 96740

Telephone: (808) 464-4047

Facsimile: (202) 204-5181

Emails: kculpepper@culpepperip.com

joshua.lee@culpepperip.com

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

FRONTIER COMMUNICATIONS
CORPORATION, *et al.*¹

)
)
) Chapter 11
)

) Case No. 20-22476 (RDD)

) (Jointly Administered)
)
)

NOTICE OF MOVIE CLAIMANTS' MOTION TO WITHDRAW REFERENCE

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of the Movie Claimants Motion to Withdraw the Reference and accompanying exhibits thereto, Voltage Holdings, LLC; Backmask, LLC; Union Patriot Capital Management, LLC; Venice PI, LLC; Bedeviled, LLC; MON, LLC; Colossal Movie Productions, LLC; TBV Productions, LLC; Definition Delaware LLC; I Am Wrath Productions, Inc.; Hannibal Classics Inc.; Justice Everywhere Productions LLC; Badhouse Studios, LLC; After Productions, LLC; Rise Up, LLC; Status Update LLC; Morgan Creek Productions, Inc.; Shock and Awe, LLC; Fun Mom Dinner, LLC; Dead Trigger Movie, LLC; YAR Productions, Inc.; Gunfighter Productions,

¹ Due to the large number of debtor entities in these chapter 11 cases, for which joint administration has been granted, a complete list of the debtor entities and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Reorganized Debtors' claims and noticing agent at <https://cases.primeclerk.com/ftt>. The location of the Reorganized Debtors' service address for purposes of these chapter 11 cases is: 50 Main Street, Suite 1000, White Plains, New York 10606.

LLC; Ace in the Hole Productions, LP; SF Film, LLC; The Rest of Us, Inc.; Killing Link Distribution, LLC; Cell Film Holdings, LLC; Dallas Buyers Club, LLC; Screen Media Ventures, LLC; Rambo V Productions, Inc.; Millennium Funding, Inc.; Millennium IP, Inc.; LHF Productions, Inc.; UN4 Productions, Inc.; Millennium Media, Inc.; Bodyguard Productions, Inc.; Hunter Killer Productions, Inc.; Fallen Productions, Inc.; HB Productions, Inc.; Laundry Productions, Inc.; Black Butterfly Film, LLC; AMBI Distribution Corp.; Dubious Productions, Inc.; Rupture CAL, Inc.; Future World One, LLC; Groove Tails Productions, LLC; Family of the Year Productions, LLC; Eve Nevada, LLC; After II Movie, LLC; Wonder One, LLC; and American Cinema International, Inc., (collectively, the “movie claimants”) by and through their counsel, will move the United States District Court for the Southern District of New York at a date and time to be determined for entry of an Order (i) pursuant to 28 U.S.C. § 157(d), Federal Rule of Bankruptcy Procedure 5011, and Local Bankruptcy Rule 5011-1, withdrawing the reference with respect to the all pre-petition and post-petition claims filed by the movie claimants and (ii) granting such other and further relief as the Court deems just and proper.

Dated: Kailua-Kona, HI June 28, 2021

/s/ Kerry S. Culpepper
Kerry S. Culpepper (admitted *pro hac vice*)
Joshua Lee (admitted *pro hac vice*)
CULPEPPER IP, LLLC
75-170 Hualalai Rd., STE B204
Kailua-Kona, HI 96740
Telephone: (808) 464-4047
Facsimile: (202) 204-5181
Emails: kculpepper@culpepperip.com
joshua.lee@culpepperip.com